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August 19, 2020

**VIA ECF**

The Honorable Katherine Polk Failla  
United States District Court  
Southern District of New York  
40 Foley Square, Room 2103  
New York, NY 10007

Re: *Geller Biopharm, Inc., v. Amunix Pharmaceuticals, Inc.*, Case No. 20 Civ. 4334 (KFP)  
Opposition to Defendant's Request for a Pre-motion Conference

Dear Judge Failla:

We represent Plaintiff Geller Biopharm, Inc. ("GBP") in the above captioned matter. We respectfully seek leave to file under seal GBP's letter in opposition to Amunix's letter requesting a pre-motion conference for its motion to dismiss the complaint under Rule 12(b)(6).

At GBP's request, the Court has placed the complaint and certain accompanying exhibits under seal, given their confidential nature. (Dkt. No. 3). Additionally, at Defendant's request the Court has placed Defendant's pre-motion letter, which extensively discusses the contents of the sealed complaints and exhibits, under seal. GBP's letter in opposition to Defendant's pre-motion letter extensively discusses these sealed documents. Therefore, GBP respectfully requests leave to file its opposition letter under seal.

Respectfully submitted,

/s/ Devora W. Allon, P.C.

Devora W. Allon, P.C.  
Vera C. Esses

*Counsel for Plaintiff Geller Biopharm, Inc.*

CC: All Counsel of Record via ECF

Application GRANTED.

Dated: August 19, 2020  
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla". The signature is written in a cursive, flowing style.

HON. KATHERINE POLK FAILLA  
UNITED STATES DISTRICT JUDGE